



ALPHA COMMUNITY BANK

137 W. Fifth St. • Minonk, Illinois 61760 • 309-432-2552 • FAX 309-432-2956

May 23, 2006

Financial Crimes Enforcement Network
P.O. Box 39
Vienna, VA 22183

Re: RIN 1506-AA85 – Providing Banking Services to Money Services Businesses

Dear Sir or Madam:

With all the current regulations and procedures of the Bank Secrecy Act that are required to open any type of account, any new regulations relating to Money Services Businesses greatly places additional burden on the banking industry - especially at the smaller bank level. Staff are already stretched to the maximum in keeping up with and maintaining compliance with all of the new Bank Secrecy Act and all it's related rules and regulations leaving little time to actually do our jobs of taking care of the customers.

I feel that it should **not** be the responsibility of the bank to verify whether a MSB's BSA is in compliance. That responsibility should be that of whatever regulatory body that the MSB is registered with - not the bank.

Also, the criteria for designation and identifying a business as a Money Services Business should be more clearly stated. An amendment to the existing threshold should include 'occasionally or rarely engages in specific transactions' and that this statement would categorize the MSB as exempt.

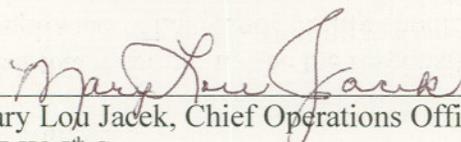
In addition, Money Services Businesses present different risk levels in different geographic locations, especially in small rural communities where the smaller bank is located. Therefore, banks should not be examined by using the same criteria for MSB's that are not located in the same type of geographic climate or size of other banks.

I would like to thank you for this opportunity to comment on the pending regulations that affect our banking community.

Sincerely,

ALPHA COMMUNITY BANK

by


Mary Lou Jacek, Chief Operations Officer

137 W 5th St.

Minonk, IL 61760

MINONK

SPRING BAY

TOLUCA

WASHBURN